

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF OHIO
WESTERN DIVISION**

CHRISTOPHER L. KEARNEY,)	CASE NO. C-1-02-479
	:	
Plaintiff,)	Judge Michael R. Barrett
	:	
vs.)	
	:	PLAINTIFF’S NOTICE OF
JEFFERSON-PILOT LIFE INS., et. al.,)	SERVICE OF EXHIBITS
	:	AND DEPOSITION
Defendants.)	DESIGNATIONS

The plaintiff, Christopher L. Kearney, hereby serves notice that he has served defendants' counsel, William R. Ellis, with a full set of copies of plaintiff's trial exhibits. Further, below are plaintiff's designations of depositions that he intends to read and/or play by video to the jury at the trial of this matter. Finally, plaintiff hereby serves Notice that he intends to call on cross-examination the corporate representatives of each defendant at the trial of this case.

Dr. Shawn Barnhart (read, if not live)

Entire Deposition

Mr. Robert Bonsall (video)

5:2 - 6:12	7:24 - 10:5	12:22 - 13:12	16:22 - 18:7
22:22 - 23:2	23:12 - 28:16	29:7-17	30:3 - 31:16
32:2-5	32:20 - 33:7	35:15-22	42:8-12
43:4-7	45:1 - 46:2	52:17 - 53:3	54:5 - 56:11
57:8 - 58:15	61:1-3	63:4-19	64:11-13

Attorney William Dempsey (video)

6:7-16	7:19 – 8:5	9:15-19	11:8-25
12:10 – 13:8	15:7-17	16:10 – 23:25	24:18 – 25:18
26:13 – 30:20	31:19 – 32:18	33:8 – 34:1	34:8-15
35:6-10	39:5-7	39:20 – 40:15	44:22 – 47:22
48:2 – 49:5	49:21 – 50:12	52:6 – 53:22	55:2-6
56:24 – 57:1	57:5 – 60:3	66:22 – 67:5	71:2 – 74:18
75:10 – 78:13	79:11-13	79:21 – 80:1	80:23 - 81:2

81:8-11	81:20 – 82:8	83:22 – 84:20	86:6-25
87:3-6	87:20 – 89:21	89:22 – 92:8	92:21 – 93:25
94:11 – 95:20	96:2-22	97:8 – 99:16	100:1-11
100:21-101:9	102:1 – 103:5	104:4 – 104:21	105:2-15
106:24 – 109:14	110:5-8		

Mr. Todd Ditmar (video)

10:11 – 10:16	12:12 – 13:22	14:16 – 14:20	22:19 – 24:11
25:1 – 2	25:11 – 13	26:14 – 27:24	32:1 – 32:5
39:9 – 45:9	51:2 – 51:11	51:19 – 54:7	6:22 – 58:17
61:10 – 61:14	61:18 – 61:23	62:11 – 63:3	65:6 – 65:15
65:24 – 67:5	69:1 – 70:3	70:16 – 70:24	71:16 – 72:8
72:22 – 74:20	77:13 – 15	77:24 – 78:7	83:24 – 85:16
86:2 – 87:5	88:11 – 89:21	90:18 – 91:3	91:10 – 93:10
97:2 – 97:6	97:17 – 97:20	99:7 – 99:13	99:23 – 100:8
109:7-16	111:16-112:3	115:16-23	116:20-117:1
117:16-119:3	120:3-19	127:20-128:9	135:8-18
143:9-145:15	145:20-23	149:11-19	156:13-157:10
157:19-158:11	162:23-163:17	164:7-23	168:4-169:17

Mr. Clyde Honaker (read, if not live)

3:6-15	11:15-23	24:20-23	30:18-22
34:4-5	35:2-9	35:18-21	38:3 – 39:15
40:17-20	41:6-17	42:5-18	43:7 – 44:18
46:8 – 48:7	50:4 – 51:7	88:5-25	89:15 – 90:7
103:9-25	109:5-12	113:6 – 114:25	116:7-12
121:5-22	123:21 – 125:11	131:11 – 132:3	132:20-25
133:7 – 134:19	138:20 – 139:3	142:8-9	

Mr. William Hughes (video)

5: 14 - 6: 11	85: 1 - 24	142: 5 - 143: 4
7: 5 - 8: 1	86: 22 - 91: 24	144: 22 - 145: 20
8: 5 - 8: 16	97: 17 - 98: 1	148: 13 - 20
21: 14 - 22: 11	99: 13 - 17	152: 17 - 154: 3
22: 21 - 24: 14	99: 21 - 100: 8	156: 1 - 19
27: 9 - 28: 14	102: 21 - 103: 20	165: 10 - 166: 23
31: 1 - 32: 13	106: 9 - 106: 14	167: 21 - 168: 1
32: 23 - 33: 6	107: 1 - 107: 16	169: 14 - 23
34: 13 - 36: 4	108: 12 - 110: 6	172: 4 - 179: 16
36: 16 - 36: 10	112:17 - 113: 1	182: 4 - 6
40: 24 - 41: 18	113: 15 - 116: 1	189: 21 - 198: 2
45: 13 - 46: 4	116: 17 - 20	198: 24 - 199: 11
46: 18 - 47: 2	117: 8 - 12	201: 4 - 9
47: 20 - 48: 23	118: 1 - 119: 1	201:19 - 202: 21

49: 19 - 50: 4	120: 14 - 23	205: 2 - 14
52: 3 - 52: 12	121: 6 - 125: 11	206: 16 - 207: 7
55: 7 - 56: 1	125: 19 - 128: 19	209: 23 - 217: 20
56: 19 - 62: 2	130: 9 - 132: 8	224: 13 - 14
62: 20 - 63: 8	133: 16 - 133: 20	226: 16 - 22
66: 8 - 68: 1	135: 18 - 21	227: 9 - 228: 7
68: 20 - 71: 13	136: 7 - 137: 11	232: 8 - 233: 12
71: 23 - 72: 12	139: 20 - 140: 24	235: 16 - 17
73: 5 - 82: 9	141: 14 - 22	

Dr. Donna Judd McClure (read, if not live)

Entire Deposition

Atty Valerie Loftin – 2004 (read)

3: 6 - 19	7: 10 - 8: 15	16: 13 - 17: 24	19: 6 - 23
21: 25 - 22: 6	25: 7 - 26: 7	26: 15 - 19	35: 2 - 8
35: 24 - 36: 8	38: 3 - 9	57: 17 - 58: 5	66: 2 - 18
68: 12 - 70: 19	79:6- 81: 20	114: 1 - 114: 13	120: 12 - 20
170: 1 - 25	173: 7 - 20		

Atty Valerie Loftin – 2007 (read)

4: 6 - 15	7: 2 - 4	12: 21 - 25	13: 19 - 20
17: 14 - 24	18: 10 - 19: 1	19:9 - 20: 14	22: 5 - 25: 25
26: 21 - 28: 16	33: 6 - 42: 3	44: 21 - 48: 5	48: 14 - 52: 1
53: 4 - 54: 25	55: 22 - 56: 6	56: 18 - 58: 18	66: 10 - 12
66: 18 - 23			

Mr. Clint Miller (read)

Entire Deposition

Mr. Robert Mills (2004) (video)

11:14-21	12:4-23	13:10-24	15:8-13
17:21-22	18:15-24	19:1-2	19:14 - 20:2
20:22 - 21:8	22:20 - 23:13	23:18 - 24:13	26:18 - 27:23
28:15 - 29:7	29:17 - 31:15	31:21 - 37:24	38:23 - 40:05
40:12 - 41:19	42:19 - 43:3	44:7-11	46:13-24
47:4-16	49:3-8	49:24 - 54:3	56:6 - 57:2
57:11-16	58:15-20	59:22 - 60:7	61:18-24
63:2-15	65:18 - 66:1	66:6-11	69:23 - 70:12
71:20 - 72:2	72:20-24	75:20 - 78:6	101:22 - 102:16
103:5 - 11	103:18 - 104:5	104:10 - 105:16	107:19 - 108:17
109:5 - 24	110:11 - 19	111:11 - 15	112:12 - 18

120:14 – 20	123:6 – 126:5	127:1 – 127:11	143:11 – 144:10
144:18 – 146:7	147:3 – 148:5	148:18 – 150:9	152:12 – 153:9
154:12 – 172:16	174:2 – 195:8	198:8 – 200:24	202:2 – 202:8
203:16 – 210:24	211:22 – 223:3	223:18 – 224:5	224:16 – 228:6

Mr. Robert Mills (2007) (video)

5:7-14	6:24 – 7:6	9:14-21	11:21 – 12:2
12:17-19	17:21 – 19:9	21:15-19	22:1-3
25:14-18	27:14 – 30:4	30:12-17	32:5-15
33:9-24	35:8 – 39:24	41:5-7	41:18 – 42:8
43:19 – 44:24	45:13 – 57:9	57:17 – 58:5	59:21 – 60:19
62:22 – 63:6	65:5-24	66:9-14	67:22 – 68:11
69:18 – 70:16	72:12 – 73:9	73:20-24	75:12 – 76:1

Attorney David Newkirk (video)

5:14 – 6:13	7:17 – 8:2	8:12 – 22	9:21 – 24
10:3-22	11:6-10	13:8-17	13:23 – 17:20
18:8 – 21:13	21:25 – 22:9	22:20 – 23:9	24:19 – 25:14
25:25 – 26:2			

Dr. Suresh Patel (read, if not live)

Entire Deposition

Mr. John Roberson (read)

3:6 – 4:15	4:21 – 5:6	7:9-17	7:21-25
9:4-5	9:12 – 12:11	14:25 – 15:4	17:10 – 20:7
21:3-10	21:24 – 22:8	25:15 – 26:10	32:14 – 33:1
33:6 – 37:9	39:20 – 40:9	40:19 – 41:11	43:10-18
44:7-12	50:2 – 51:4	53:5-17	53:23-25
55:10-16	56:10 – 57:7	58:25 – 60:6	62:6 – 64:18
65:11 – 69:16	70:1 – 71:23	76:21 – 78:6	80:18-22

Mr. Harold Shelton (read)

3: 6 – 15	3: 22 – 23	4: 9 – 25	5: 5 - 7: 5
8: 13 – 15	9: 12 - 13: 1	13: 6 – 12	13: 18 - 24
37: 19 - 40: 11	40: 20 - 41: 22	44: 3 - 44: 16	46: 9 - 49: 14
51: 11 - 52: 11	52: 19 - 52: 23	53: 7 – 13	54: 1 - 8
54: 16 – 21	62: 22 - 63: 5	64: 3 – 7	64: 23 - 65: 7
68: 21 – 25			

Plaintiff, Christopher Kearney reserves the right to amend and modify these designations through trial, including rebuttal.

Respectfully submitted,

OF COUNSEL:

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CERTIFICATE OF SERVICE

The undersigned hereby certifies that the above was filed electronically with the ECF system and was thereby electronically served this 10th day of September 2007, on William R. Ellis, Wood & Lamping, 600 Vine Street, Suite 2500, Cincinnati, Ohio 45202 and John Meagher, Shutts & Bowen LLP, 1500 Miami Center, 201 South Biscayne Blvd., Miami, Fl. 33131.

/s Michael A. Roberts